



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, PA 19103-2029

November 20, 2017

Mr. James Oppenheim, PE  
Evergreen Resources Management Operations  
2 Righter Parkway, Suite 200  
Wilmington, DE 19803

**Subject: Request for further investigation - AOI-7**

Dear Mr. Oppenheim:

The United States Environmental Protection Agency (EPA) has received and is currently reviewing the June 27, 2017 RCRA Facility Investigation Report for AOI 7 Former Ethylene Complex Marcus Hook Industrial Center (Facility) located in Claymont, Delaware.

Prior to submitting AOI 7 inclusive comments, EPA is requesting further investigatory work be performed regarding exceedances in soil, groundwater, and sediment at the Facility. The purpose is to assist in current remedial efforts ongoing at the adjacent Delaware Valley Works/General Chemical Corporation/Honeywell facility. Items suggested to be investigated are summarized below.

- Confirm elevated groundwater arsenic concentrations in wells along the shoreline,
- Characterize arsenic in sediments and porewater,
- Estimate arsenic mass flux for groundwater-to-surface water pathway
- Estimate arsenic and sediment loading from Middle Creek into Delaware River

Please contact me at 215-814-2796 or [bilash.kevin@epa.gov](mailto:bilash.kevin@epa.gov) upon receipt and review of this letter to arrange a meeting to discuss the request.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Bilash", is written over a horizontal line.

Kevin Bilash  
Land & Chemicals Division  
US Environmental Protection Agency, Region III

cc: Luis Pizarro, EPA  
Colleen Costello, GHD